



January 9, 2008

Mr. Mazi Shirakh
California Energy Commission
1516 Ninth Street, MS-25
Sacramento, CA 95814

Dear Mr. Shirakh,

Musco Sports Lighting would like to offer the following comments and suggestions related to the 45-day proposed wording for the 2008 Building Energy Efficiency Standards. I realize that we are late with these comments, but would appreciate your consideration of them and apologize for not providing a timely response to the proposed standards.

Section 119(i)(4): The logic of the proposed wording is inverted. Astronomical time parameters are developed from latitude, longitude, and time zone information, not *vice versa* as stated in the proposed wording. It is the latitude, longitude, and time zone information that needs to be retained during power outages.

Section 146(a)(3): We would like to see a separate exclusion for large indoor sports venues (for example, college and professional arenas) for wattage used during sporting events. These facilities always require high illumination levels for playability and often for television broadcast requirements (although reduction in illumination levels for non-broadcast games would not always be practical). Venues could likely be qualified based on seating capacity or building size so that smaller venues like high-school gymnasiums would not be excluded.

Section 146, Table 146-F, Exercise Center, Gymnasium: In our experience, an Allowed Lighting Power of 1.0 W/ft² is not sufficient for a gymnasium due to the high ceilings typically found in gyms. We suggest a separate category for gyms with an Allowed Lighting Power of 2.0 W/ft². A lower level will not likely provide sufficient light on the floor to allow safe play and minimize risk of injury to participants in athletic activities.

Section 147, Introduction, Exception #4: We completely agree that the unusual requirements of sports and athletic fields and children's playgrounds justify the continued exemption of those facilities from Section 147 requirements for lighting power. We would suggest, however, that it makes sense to require controls on those lights to ensure they are turned off during daylight hours and when not in use, and would further suggest an Outdoor Astronomical Time-Switch Control (ref. Section 119(i)(4) - proposed) as the most appropriate type of control for such installations.

Please feel free to contact me if you require any clarification or additional information. Thank you.

Best Regards,

Al Sheldon

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